

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

WARRIOR LACROSSE, INC., a  
Michigan corporation,

Plaintiff,

vs.

Civil Action No. 02-70193  
Judge George Woods

J. deBEER & SONS, INC., a  
Tennessee corporation,

Defendant.

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Attorneys for Defendant.

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**ANSWER**

For its answer to the Complaint filed by Warrior Lacrosse, Inc. ("Warrior"), J. deBeer & Sons, Inc ("deBeer") states as follows:

**THE PARTIES**

1. deBeer admits the allegations contained in paragraph 1 of the Complaint upon information and belief.
2. deBeer is without information to form a belief as to the truth of the allegations contained in Paragraph 2 of the Complaint and, on that basis, denies them.
3. deBeer admits the allegations contained in Paragraph 3 to the extent that debere has a place of business in Tennessee.
4. deBeer admits the allegations contained in Paragraph 4 of the Complaint.

**JURISDICTION**

5. deBeer admits that the cited statutes regulate patents but denies that a cause of action exists.
6. deBeer admits that the cited statutes regulate jurisdiction in a patent suit but denies that a cause of action exists.
7. deBeer admits that the cited statutes regulate venue in a patent suit but denies that a cause of action exists.

**COUNT I – PATENT INFRINGEMENT**

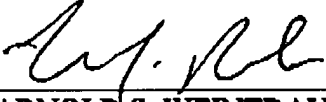
8. deBeer repeats and realleges its responses to Paragraphs 1 through 7 as if set forth fully herein.
9. deBeer admits that the cited statutes regulate patents but denies that a cause of a action exists.
10. deBeer denies the allegations contained in Paragraph 10 of the Complaint.
11. deBeer denies the allegations contained in Paragraph 11 of the Complaint.

12. deBeer denies the allegations contained in Paragraph 12 of the Complaint.

**AFFIRMATIVE DEFENSES**

Warrior's Complaint fails to state a claim upon which relief can be granted.

PLUNKETT & COONEY, P.C.

By:   
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Attorneys for Plaintiff

DATED: April 25, 2002

**Proof of Service:**

The undersigned certifies that a copy of the foregoing instrument was served upon the attorneys of record of all parties to the above cause by mailing the same to them at their respective business addresses as disclosed by the pleadings of record herein, with postage fully prepaid thereon on the 25th day of April, 2002. I declare under the penalty of perjury that the statement above is true to the best of my information, knowledge and belief.

  
Pat Borowski

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